

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB and JAMES JUNG, as
Administrators of the Estate of LOUIS
JUNG, JR,

Plaintiff,

v.

CITY OF PHILADELPHIA; YesCare Corp.;
BLANCHE CARNEY, Former
Commissioner of Philadelphia Dept. of
Prisons; LALITHA TRIVIKRAM;
MAUREEN GAY; Correctional Officer John
Does 1-10,

Defendants.

No. 2:24-cv-05618-TJS

JURY TRIAL DEMANDED

CERTIFICATE OF MERIT

I, Bret Grote, Esquire, certify that:

An appropriate licensed physician and expert in diabetes care, Louis Phillipson, M.D., Ph.D, has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by defendant Maureen Gay in the above-captioned action in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm.

Respectfully submitted,

/s/ Bret Grote

Bret Grote

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